



Bullock Creek Community Auditorium

October 12, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Bullock Creek high school, located in Midland, MI, that provides approximately 80 performances per year to 24,000 audience members and education programs to 2500 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

I strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

School theatre programs and professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while limiting significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to educational theatre, both in the training and safety of students, onstage and backstage.

We currently use wireless microphones, wireless communications, and wireless DMX. During our presentations or performances we will regularly use anywhere from 1 to 20 wireless devices. Our current wireless devices use VHF channels in the 169-177 MHz range, UHF channels in the 494-596 MHz range, and 2.4 GHz. Some are on fixed channels and others can be tuned to a range of 24 channels.

We own our wireless equipment of which we take exceptional care of and expect to last for years given that we have a limited budget to work with. Most of our original wireless equipment of which we depended on and used on a regular basis used the 700 MHz range and had to be replaced over the course of a couple years as our budget did not allow for the replacement of all of it at one time. Replacement cost was approximately \$3500.



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I am the full-time auditorium manager/technician who runs and maintains all of our audio and lighting equipment, including the use of our wireless equipment both within the auditorium and our school. I am knowledgeable and educated in the use and care of wireless communications.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

I appreciate that the Commission has sought Public Comment on this very important issue. Educational institutions and professional performing arts organizations should have access to reliably available spectrum with interference protection. Our theater does not only serve our school district, it is a community venue that is rented out and used by many businesses, organizations and professionals both in and outside of our community. We operate our theater professionally and those who use it expect professionalism when they invest in the use of our facility for their events. I would ask that the Commission take into consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my organization's sound equipment. Once that investment has been made, I would like some assurance that the system will work properly and without interference.

Besides education, school theatre programs provide demonstrable service to their individual communities, serving as a hub for entertainment, dialogue, and affirmation of student achievement and growth in important 21st century skills, such as creativity and collaboration. They also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate schools and performing arts organizations that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,

Jason Tisdale, Manager
Bullock Creek Auditorium